

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LIQWD, INC. and OLAPLEX LLC,)
Plaintiffs,)
v.) C. A. No. 17-14 (JFB) (SRF)
L'ORÉAL USA, INC., L'ORÉAL USA)
PRODUCTS, INC, L'ORÉAL USA S/D,)
INC., and REDKEN 5TH AVENUE NYC,)
L.L.C.,)
Defendants.)

**PLAINTIFFS' DAUBERT MOTION TO EXCLUDE
THE EXPERT OPINION OF DAVID NOLTE**

Plaintiffs Liqwd, Inc. and Olaplex LLC (collectively, "Olaplex") hereby move to exclude the expert opinion of David Nolte. The grounds for this motion are set forth in Olaplex's opening brief submitted herewith.

OF COUNSEL:

Joseph M. Paunovich
Ali Moghaddas
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
(213) 443-3000

Adam DiClemente
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
(212) 849-7000

Matthew K. Blackburn
DIAMOND McCARTHY LLP
150 California Street, Suite 2200
San Francisco, CA 94111
(415) 692-5200

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Anthony D. Raucci
Jack B. Blumenfeld (#1014)
Jeremy A. Tigan (#5239)
Anthony D. Raucci (#5948)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@mnat.com
jtigan@mnat.com
araucci@mnat.com

Attorneys for Plaintiffs

March 14, 2019

RULE 7.1.1 CERTIFICATE

I hereby certify that the subject of the foregoing motion has been discussed with counsel for Defendants and that we have not been able to reach agreement.

/s/ Anthony D. Raucci
Anthony D. Raucci (#5948)

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on March 14, 2019 upon the following in the manner indicated:

Frederick L. Cottrell, Esquire
Jeffrey L. Moyer, Esquire
Jason J. Rawnsley, Esquire
Katharine Lester Mowery, Esquire
RICHARDS, LAYTON & FINGER, PA
One Rodney Square
920 North King Street
Wilmington, DE 19801
Attorneys for Defendants

VIA ELECTRONIC MAIL

Dennis S. Ellis, Esquire
Katherine Murray, Esquire
Adam M. Reich, Esquire
Serli Polatoglu, Esquire
PAUL HASTINGS LLP
515 South Flower Street, 25th Floor
Los Angeles, CA 90071
Attorneys for Defendants

VIA ELECTRONIC MAIL

Naveen Modi, Esquire
Joseph E. Palys, Esquire
Daniel Zeilberger, Esquire
Michael A. Wolfe, Esquire
PAUL HASTINGS LLP
875 15th Street, N.W.
Washington, D.C. 20005
Attorneys for Defendants

VIA ELECTRONIC MAIL

Scott F. Peachman, Esquire
PAUL HASTINGS LLP
200 Park Avenue
New York, NY 10166
Attorneys for Defendants

VIA ELECTRONIC MAIL

/s/ Anthony D. Raucci
Anthony D. Raucci (#5948)